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September 18, 2010

VIA ECF and FILED UNDER SEAL

Honorable Sandra L. Townes
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. James Bombino*, 10 CR 00147 (SLT)

Dear Judge Townes,

We respectfully request that Your Honor accept this letter asking that Mr. James Bombino be permitted to attend to his son, Alfred Bombino, solely for medical emergencies, at St. John's University, located at 8000 Utopia Parkway, Queens, New York. As the Court is aware, Mr. Bombino was granted bail in the aforementioned case and has complied with all bail conditions. The conditions currently permit Mr. Bombino to travel within the Eastern District of New York between 5:30 am and 9:00 pm in order to attend his employment.

Alfred is a freshman living on campus at St. John's University. He is currently under psychiatric care and taking prescription medication related to his condition. Alfred has attempted suicide twice in the past two years and also experienced extreme hysterics resulting in his remittance to Staten Island Psychiatric Center and Holliswood Hospital in Queens.

The St. John's campus is located in the Eastern District of New York, within Mr. Bombino's approved area of travel. Alfred's home and psychiatrist is nearly 40 miles from campus, approximately a one hour drive. If Alfred were required to seek help on his own during one of his breakdowns, public transportation would require him to take 2 buses and 3 trains, roughly 3 or more hours of travel in addition to it being unlikely that Alfred would be able to negotiate such a trip given his mental state at that time.

Traditionally, Mr. James Bombino is the only other person who has attended Alfred's psycho therapy and psychiatric visits. In addition, Mr. Bombino has been the only person capable of controlling and pacifying Alfred during his mental breakdowns. His wife has neither the physical strength nor capacity to calm Alfred during such a time as she is weaker than Alfred and the fulltime caretaker for their two young daughters.

In particular, Mr. Bombino requests that his bail conditions be modified so that he may be permitted to travel to St. John's University to attend to his son during a medical emergency. Mr.

Bombino recognizes and appreciates the fairness of his current bail conditions and asks that in addition he be allowed to attend to his son without first seeking approval from the Court, as time is of the essence during one of Alfred's emergencies.

Thank you for your time and consideration.

Respectfully submitted,

By: /s/John C. Meringolo, Esq.

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Cc: Amy Brusa
Pre-trial via facsimile